

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**HARVARD'S ASSENTED-TO MOTION TO FILE UNDER SEAL  
HARVARD'S LETTER TO THE COURT REGARDING  
JUNE 6, 2017 DISCOVERY ORDER**

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (Dkt. 55), Defendant President and Fellows of Harvard College ("Harvard") hereby moves this Court for an order sealing in its entirety Harvard's Letter to the Court Regarding June 6, 2017 Discovery Order. This document refers to and attaches information designated as Confidential or Highly Confidential–Attorneys' Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55). Harvard's Letter will be filed in response to the Court's June 6, 2017 sealed discovery order (Dkt. 326). Pursuant to Local Rule 7.1(a)(2), SFFA was made aware of this motion and assents to it.

Harvard requests that the document subject to this Motion be impounded until further order of the Court. In the event the Court has not previously ordered otherwise, Harvard's submission should be returned to its undersigned counsel upon resolution of this matter.

WHEREFORE, Harvard respectfully requests that the Court grant this motion and allow Harvard's Letter to the Court Regarding June 6, 2017 Discovery Order to be filed under seal and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth (BBO #665232)

William F. Lee (BBO #291960)

Andrew S. Dulberg (BBO #675405)

Elizabeth Mooney (BBO #679522)

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston, MA 02109

Tel: (617) 526-6000

Fax: (617) 526-5000

[william.lee@wilmerhale.com](mailto:william.lee@wilmerhale.com)

[felicia.ellsworth@wilmerhale.com](mailto:felicia.ellsworth@wilmerhale.com)

[andrew.dulberg@wilmerhale.com](mailto:andrew.dulberg@wilmerhale.com)

[elizabeth.mooney@wilmerhale.com](mailto:elizabeth.mooney@wilmerhale.com)

Seth P. Waxman (*pro hac vice*)

Paul R.Q. Wolfson (*pro hac vice*)

Daniel Winik (*pro hac vice*)

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Ave. NW

Washington, D.C. 20006

Tel: (202) 663-6800

Fax: (202) 663-6363

[seth.waxman@wilmerhale.com](mailto:seth.waxman@wilmerhale.com)

[paul.wolfson@wilmerhale.com](mailto:paul.wolfson@wilmerhale.com)

[daniel.winik@wilmerhale.com](mailto:daniel.winik@wilmerhale.com)

Debo P. Adegbile (*pro hac vice*)

WILMER CUTLER PICKERING

HALE AND DORR LLP

7 World Trade Center

250 Greenwich Street

New York, NY 10007

Tel: (212) 295-6717

Fax: (212) 230-8888

[debo.adegbile@wilmerhale.com](mailto:debo.adegbile@wilmerhale.com)

Dated: June 21, 2017

*Counsel for Defendant President and  
Fellows of Harvard College*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a)(2), I hereby certify that Students for Fair Admissions, Inc.'s counsel was made aware of this motion before it was filed and assents to Harvard's request to file its Letter to the Court Regarding June 6, 2017 Discovery Order under seal.

*/s/ Felicia H. Ellsworth*  
Felicia H. Ellsworth

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

*/s/ Felicia H. Ellsworth*  
Felicia H. Ellsworth